

suit in Maryland against Anderson and Bedlow, and obtained a writ of arrest of the ship. Bedlow, who had chartered the ship, filed a bond, and was temporarily given possession of the ship. At a later session the litigants appeared in court but Hudson failed to establish his title. The case finally came before a jury, which brought in a split verdict. The court then decided that Hudson had established a good title (pages 288-289, 321, 323, 372, 511, 552-553). The case was appealed to the General Assembly by Anderson and Bedlow through their attorneys, Thomas Notley and John Morecroft, and was heard before the Upper House, April 26, 1666. Hudson not making an appearance, action was postponed until the next session (Arch. Md. II; 33). As there is no later mention of the case in the Assembly Proceeding it would appear that Hudson lost by default or settled out of court.

A case involving the violation of the Navigation Act by the sloop *Red Sterne*, came up before the court at its December, 1664, session. It was charged that the owner, Jacob Bakker of New York, was not an English citizen, and therefore not free to trade under the terms of the Act. He was given six months by the court to justify his action in doing so. New York had been very recently taken from the Dutch, and had been only four months under English rule, and the nationality of its Dutch citizens was the question at issue. Bakker and his partner produced in court a lengthy letter from Colonel Richard Nicolls, the English governor of New York, which clearly set forth the legal status of the Dutch, who, he declared, had become English subjects as a result of their surrender to the English forces. Nicolls insisted that Bakker had the rights of an English subject, and incidentally pointed out to the Maryland authorities that they themselves had not observed certain features of the Navigation Act, and that he could make it rather unpleasant for them if he were so disposed. The court referred Bakker's case to a jury, which found him not guilty of violating the Act (pages 323, 324, 388, 391-393). The following case also refers to trade with the Dutch. At a December, 1664, session of the court, information was filed by the Attorney-General against six prominent Marylanders, who had incurred obligations due to the Burgomasters of Amsterdam, based on what was claimed to be unlawful trade with the Dutch. The question at issue was whether these debts were forfeitable under the Navigation Act. The transactions related to the smuggling of tobacco over the Elk River route to Delaware, when that territory was still in the possession of the Dutch, and before it had been taken over by the English. Alexander d'Hinoyossa, the late Dutch governor of the Delaware River settlements, at this time living in Maryland, although he soon after returned to Holland, figures prominently in the case. Those charged with thus trading illegally were Augustine Herman, Samuel Goldsmith, Henry Stockett, Charles James, Richard Bennett and Nathaniel Utie. The case does not appear to have been pressed (pages 299, 341-342).

Difficulties between shippers and shipmasters not infrequently came before the court. John Foxhall had a dispute with a Bristol shipmaster named Absalom Covent. He claimed the ownership of certain tobacco but Covent refused to recognize him as the consignee. To add insult to injury the shipmaster took